

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WILLIAM P. CHERNICOFF,	*
	*
Plaintiff	*
	*
v.	*
	*
NCO FINANCIAL SYSTEMS, INC., LOVELACE	*
HEALTH SYSTEMS, EQUIFAX	*
INFORMATION SERVICES, LLC,	*
BIRCHWOOD CREDIT SERVICES, INC.,	*
TRANS UNION CORPORATION, and	*
EXPERIAN NATIONAL ASSISTANCE	*
CENTER,	*
	*
Defendants	*
	*

JOINT STATEMENT

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above named parties have conferred and state as follows:

JOINT DISCOVERY PLAN AND MOTION SCHEDULE:

The parties propose the following pre-trial schedule:

1. Initial disclosures, due by September 14, 2004.
2. Propound discovery requests under Rules 33, 34 and 36, due by October 15, 2004.
3. Responses to discovery requests due by December 15, 2004.
4. Notices of deposition of fact witnesses served by February 15, 2005.
5. The plaintiff's expert witnesses shall be designated by March 30, 2005 and plaintiff's expert witness report submitted by April 30, 2005. Defendants' expert witnesses shall be designated by May 30, 2005 and defendants' expert witness report submitted by June 30, 2005

6. Discovery completed by July 30 2005.
7. Summary judgment filed by August 30, 2005.
8. Opposition to motion for summary judgment due by September 30, 2005.
9. Final pretrial conference completed on or before October 15, 2005.
10. Due to the unusual factual situation of this claim, the plaintiff cannot yet determine whether more than ten (10) depositions will be needed during the discovery period.
11. Certifications regarding each party's consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.

Defendant NCO Financial Systems, Inc.,
and Lovelace Health Systems,
by their counsel,

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Respectfully submitted,
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August 26, 2004

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